

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA,	)	
	)	Case No. 15-2459
Plaintiff,	)	
	)	
v.	)	
	)	
ALAN CHRISTOPHER REYES, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**UNITED STATES' MOTION FOR ENTRY OF DEFAULT**

Plaintiff, the United States of America, requests that the Clerk of the Court enter default against the Defendants, SunTrust Bank and First Tennessee Bank, pursuant to Federal Rule of Civil Procedure 55(a). The summons and a copy of the complaint were served on SunTrust and First Tennessee through their registered agents, The Corporation Trust Company and Lenore S. Halle, on July 15 and 17, 2015, respectively. SunTrust and First Tennessee have failed to answer or otherwise respond to the complaint.

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DATED: August 18, 2015

CAROLINE D. CIRAULO  
Acting Assistant Attorney General

EDWARD L. STANTON III  
United States Attorney

/s/ Stephen A. Josey  
STEPHEN A. JOSEY  
TN BPR #: 031179  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 227, Ben Franklin Station  
Washington, D.C. 20044  
202-307-1427 (v)  
202-514-6866 (f)  
Stephen.a.josey@usdoj.gov

CERTIFICATE OF SERVICE

I, Stephen Josey, hereby certify that on August 18, 2015, I filed the foregoing UNITED STATES' MOTION FOR ENTRY OF DEFAULT with the Clerk of Court, using the CM/ECF system, and served the Defendants, Alan C. Reyes, Vernice Kuglin, SunTrust Bank, and First Tennessee Bank, by mailing a true and correct copy thereof by first-class mail, postage prepaid, and addressed to the following:

*Defendants*

Alan C. Reyes  
1 South Main St.  
Memphis, TN 38103

Vernice Kuglin  
200 Wagner Place, Apt. 802  
Memphis, TN 38103

SunTrust Bank  
Corporation Service Company  
2908 Poston Ave  
Nashville, TN 37203

First Tennessee Bank  
Attn: Lenore S. Halle  
165 Madison Ave.  
Memphis, TN 38103

/s/ Stephen A. Josey  
STEPHEN A. JOSEY